

**Richmond Local Plan – Examination in Public**  
**Opening Statement by the London Borough of Richmond upon Thames**  
**26 September 2017**

**Welcome and introductions**

My name is Andrea Kitzberger-Smith and I am the Planning Policy and Design Team Manager for Richmond and Wandsworth Borough Councils. On behalf of Richmond Council, I would like to welcome the Inspector, Mr Andrew Seaman, as well as all those attending this examination in public.

My colleagues, Joanne Capper, Caroline Steenberg, Fiona O'Toole, Rebecca Brown and Rob Wellburn, and other officers within the Council as well as our elected Members have worked tirelessly over the last few years to get this Plan to this crucial stage in the plan-making process.

I would also like to thank Charlotte Glancy, the Programme Officer from Banks Solutions, for her management of the examination process so far.

**The Local Plan journey**

I would now like to take you through our Local Plan journey. The Council's Core Strategy and Development Management Plan were adopted in 2009 and 2011 respectively. In 2012/2013, we started work on a Site Allocations Plan, which we took through various rounds of public consultation. However, in 2015, it became evident that we needed to keep the whole Local Plan up to date as a number of significant changes and challenges have taken place in planning policy and legislation at a national, regional and local level. The Council therefore agreed that a review of the existing policies contained within the Core Strategy and Development Management Plan should be undertaken. The site allocations that the Council had already been working on would also be included within this Local Plan Review.

This Local Plan has therefore been prepared in response to a number of changes and challenges that are taking place in Richmond and more widely in the London area.

The purpose of this Local Plan Review is:

- To address local priorities, needs and opportunities, in particular to strengthen the economic focus and to support businesses whilst at the same time providing for new housing;
- To reflect and take account of updated evidence base and the demand for housing and employment land;
- To ensure policies are in accordance with national policies and in general conformity with the London Plan, including taking account of the London Plan minimum housing target of 315 homes per annum;
- To ensure the Spatial Strategy and the Plan's policies strike an appropriate balance with providing school places, health care, transport facilities and other key community facilities to support a growing population and achieving sustainable communities;
- To take account and address the implications of Government changes, such as new Permitted Development rights and changes to technical Housing Standards;
- To take account of and reflect the outcomes of the Council's village planning approach, including ensuring matters and issues raised by the local community are considered;
- To address the increasing health inequalities and wider determinants of health and well-being; and
- To provide certainty for developers and landowners by clearly setting out the Council's expectations and requirements.

The Council has gathered a wealth of evidence and studies to underpin and feed into the Local Plan Review, including on housing, employment, infrastructure and viability to name but a few. The issues raised in both the evidence and the various public consultations, including those from the village planning processes, have been carefully considered and examined prior to advancing them in the Local Plan. The Plan has also been subject to comprehensive Sustainability Appraisal to assess reasonable alternatives and consider the Plan's environmental, social and economic impacts.

The journey for producing the Local Plan has not been an easy one as the Council has had to balance a number of needs and priorities. There is a need for providing new homes, in particular affordable homes, employment and retail floorspace whilst also providing the necessary community infrastructure that supports the growth and increase in population. At the same time, the Council has to respond to the concerns of our residents and local communities about the scale of growth and the impacts from proposed development.

### **Sustainable development in Richmond borough**

Sustainable development is at the heart of what the Council does, and the Council has always followed the concept of 'sustainable development' and its three dimensions of economic, social and environmental within the plan-making journey. The Plan sets out what sustainable development means in the context of Richmond borough, including the Council's approach to applying the presumption in favour of sustainable development and how this is expressed locally.

Richmond is a very unique borough, with approximately 55% of the borough being designated Metropolitan Open Land and Green Belt, and over half of the borough being designated as Conservation Areas. The natural and historic environment within the context of London is exceptional, with Richmond being the only borough that spans across both sides of the River Thames, with a large number of nationally significant heritage and cultural assets, including the Royal Botanic Gardens Kew World Heritage Site, Hampton Court Palace as well as Royal Parks, Richmond Park and Bushy Park. In total, more than two thirds of the borough is protected by either open land or conservation designations.

Therefore, the Council places strong emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of this borough by recognising the environmental constraints and limits that provide the context for growth in the borough and which need to be respected.

### **Village Planning**

Since the adoption of the Core Strategy and Development Management Plan, the Council has embarked on an ambitious programme of developing non-statutory Village Plans for each of the borough's 14 villages. This is in recognition of the borough's unique and exceptional historic and built as well as natural environmental. Village Plans are a tool which the Council uses to help understand issues in each village community, to tailor services, and to facilitate communities to address issues themselves. Each Village Plan describes a vision for the village area, and identifies what the Council will do, and what local people can do, to achieve the vision together.

Following the development of the non-statutory Village Plans, communities expressed a desire to shape planning guidance for their local village areas. As a result, in 2013 the Council has established a rolling programme to develop Village Planning Guidance SPDs to ensure borough-wide coverage, with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its

own Neighbourhood Plan. The majority of the SPDs are now adopted and their results and outcomes have been fed into the Local Plan Review. The only outstanding SPDs are for Twickenham and Strawberry Hill, which have already gone through the statutory consultation processes and are anticipated to be adopted later this year. These SPDs, collectively, together with the Ham and Petersham Neighbourhood Plan, of which the final version has just been submitted to the Council, provide the overarching framework for assessing character and design in the borough.

### **The Richmond Local Plan**

Richmond is a very special place to live, work and visit, with a very strong sense of place that our communities are proud of. The Local Plan and its policies reflect the unique and special character of this borough, the individual characteristics of the villages and its location in outer London.

The Local Plan builds on adopted policies in the Council's existing plans, i.e. the Core Strategy and Development Management Plan policies. The vision for the borough has three inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. These three themes provide the golden thread that runs through the Plan, and they have been taken forward from the Core Strategy's vision and spatial strategy. The vision and the spatial strategy were publicly consulted upon and agreed corporately to ensure they align with the latest Community Plan as well as the Corporate Plan for the borough, thereby representing a Plan for our local communities. The objectives and policies follow logically from the spatial vision and spatial strategy, and each objective is clearly linked to a relevant policy in the Plan.

The Spatial Strategy reinforces the borough's context as an outer London Borough that is characterised by its special and unique natural and historic environment, providing opportunities for recreation, sport, culture and tourism for not only those that live and work in this borough, but also for those from neighbouring and other London boroughs, thereby providing a green lung for southwest London. The Strategy also emphasises that local community needs, including delivery of housing and the infrastructure required to support it, are expected to be met without compromising the quality of the natural, built and historic environment.

Despite the constrained nature of the borough, there is a need to provide more housing, employment and other community and infrastructure services. The Plan's Strategy is to accommodate growth mainly within existing built-up areas. The traditional village based structure will be maintained and reinforced with a range of housing, employment opportunities, shops, and local services. Richmond and Twickenham centres, together with their residential areas surrounding them, are expected to deliver the highest number of housing units, with commercial developments being mainly located within the borough's centres. There are very few large scale sites for redevelopment in this borough, but where such opportunities arise, for example on Stag Brewery and Ham Close, the Plan and its policies seek to ensure uses contribute to addressing local needs.

In many cases, the Local Plan continues the policy approaches already successfully being implemented, whereas in others we have taken the opportunity to amend and update policies to make them more effective and respond to emerging issues and changing circumstances. The Local Plan responds positively to seeking opportunities to meet the needs of the borough, including the objectively assessed needs for homes, jobs and other key community facilities in a way that is compatible with the specific context and constraints of Richmond.

Given the unique character, location and special local circumstances in Richmond, there are occasions where national or regional policy and guidance is considered to be insufficient or not as appropriate.

Where this has been identified to be the case, we have developed a local, evidence-based approach that is considered to be effective in addressing the needs whilst at the same time taking account of the significant constraints that this borough faces.

This is consistent with the NPPF which states in paragraph 10 that: *“Plans... need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”*

In addition, we acknowledge that due to the special character of the borough, with over two thirds being constrained by designations and the remaining areas being relatively dense low-medium rise centres, towns and villages, that the Plan is unable to meet the objectively assessed housing and employment needs. Notwithstanding, the Plan positively seeks opportunities to meet the development needs in the borough unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF. This approach is consistent with paragraph 14 of the NPPF.

### **Summary and conclusion**

To conclude, the Council considers that this Local Plan provides a sound and positive strategy for achieving sustainable development in the borough. All the statutory procedures and legislation, including for public consultation, have been adhered to and the Council is confident that the Plan is sound as it has been positively prepared, it is justified, it is effective and it is consistent with national policy as well as in general conformity with the London Plan.

The Local Plan has been shaped by on-going and continuous consultation and engagement with our Duty to Co-operate bodies, statutory consultees, key stakeholders and landowners as well as local communities, including residents and businesses. The results from these engagement activities and consultations, together with the robust and proportionate evidence base, including the outcomes of the Sustainability Appraisal, have informed what we consider to be a sound Local Plan that reflects and tells Richmond borough’s story. We would like to thank all those who have engaged with us over the years, and whose contributions have helped to improve the Plan.

We consider that our Plan strikes the right balance between achieving sustainable development and growth within the borough with the need to provide for essential community infrastructure, such as school places, health care and transport facilities that are necessary to support a growing population, whilst at the same time protecting and enhancing the special and unique environment of Richmond.

We recognise that some matters require closer scrutiny during this examination. The Council welcomes the opportunity to pro-actively discuss these matters during the course of these upcoming hearing sessions. We look forward to actively engage in positive discussions with the Inspector and participants, and we are willing to consider modifications where the Inspector thinks these are necessary to make the Plan sound.

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